

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**In re: Robert Tauler**

**Case No. 1:21-mc-00675**

**ROBERT TAULER'S WITNESS LIST**

**WITNESS LIST**

Respondent hereby submits the following witness list for the October 15, 2021 hearing:

1. **Robert Kinney** – Plaintiff and self-represented counsel in the *Kinney v. Jowers* matter. Mr. Kinney is the author of Kinney Letter sent secretly to Admissions Committee. Mr. Kinney will be examined on the falsehoods contained in his letter, and the circumstances by which he believed he could impact Mr. Jowers’ counsel’s admission through his *ex parte* communications with a governmental body by way of the Kinney Letter.
2. **Gary E. Zausmer** – Leader of the Admissions Committee. This witness will be examined on his communications with Mr. Tauler on behalf of the Admissions Committee, as well as his decision to refuse to provide Mr. Tauler with the Kinney Letter. Mr. Zausmer will also be examined on his decision to send communications between himself and Mr. Tauler to every Article III judge sitting in the Austin division. Mr. Zausmer will also be questioned on his position that the Admissions Committee serves as an “arm” of this district, which in turn is a branch of the federal government.
3. **Kevin J. Cole, Robert Freund, P. David Cienfuegos** - These three witnesses each separately submitted a letter of reference to the Western District of Texas regarding Mr. Tauler’s moral character on behalf of Mr. Tauler’s application. These witnesses will testify that they were never contacted by the Admissions Committee as part of its “investigation” into Mr. Tauler’s moral character. Alternatively, should it please the Court, these witnesses agree to testify through declarations in the interests of time.
4. **Raymond W. Mort, III** – Counsel for Robert Kinney in the *Kinney v. Jowers* matter. Mr. Mort was referenced in Kinney Letter as co-counsel who assisted with Kinney Letter. Mr. Mort will be examined on his role in the scheme to secretly deprive Mr.

Jowers of his litigation counsel by assisting with secret communications to an arm of the Western District of Texas.

**5. Michael Marin, Viktor Olavson, Lisa Paulson, Archie Carl Pierce, Kevin W. Cole, David Whittlesey** - Members of the Admissions Committee. These witness will testify as to their role, if any,<sup>1</sup> in the decision to not recommend Mr. Tauler as a member of the Western District, as well as the lack of any discipline imposed on Robert Kinney for having *ex parte* communications with the Committee for unlawful purposes.

**6. Evan Jowers** - Mr. Jowers will testify as to why Mr. Tauler is the only possible counsel he could have to represent him in the *Kinney v. Jowers* matter, and to Mr. Kinney's knowledge of these circumstances in the weeks leading up to the Kinney Letter.

DATED: September 14, 2021

Respectfully submitted,

By: /s/ Robert Tauler  
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<sup>1</sup> Should any of these witnesses provide a declaration that they had no involvement in the above, then they will not be called.